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District Counsel for Tulare Local Healthcare District

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

In re

SOUTHERN INYO HEALTHCARE
DISTRICT,

Debtor.

CASE NO. 16-10015-A-9

Chapter 9

DC NO.: WW-1

Date: N/A

Time: N/A

Place: 2500 Tulare Street
Fresno, CA 93721
Courtroom 11

Judge: Honorable Fredrick E. Clement

APPLICATION FOR EX PARTE ORDER AUTHORIZING FRBP 2004 EXAMINATION
AND PRODUCTION OF DOCUMENTS
(SOUTHERN INYO HEALTHCARE DISTRICT)

TO THE HONORABLE RENÉ LASTRETO II, UNITED STATES BANKRUPTCY

JUDGE:

1 TULARE LOCAL HEALTHCARE DISTRICT, dba TULARE REGIONAL MEDICAL
2 CENTER ("TRMC" or "Applicant"), Interested Party in the above captioned Chapter 9
3 bankruptcy proceeding, hereby files this Application for Ex Parte Order compelling
4 Southern Inyo Healthcare District, to produce certain documents for inspection and
5 copying and, if requested, to appear for a FRBP 2004 Examination.

6
7 **Southern Inyo Healthcare District**
8 **501 E. Locust St.**
9 **Lone Pine, CA 93545**

10 Applicant represents as follows:

11 1. TRMC filed a voluntary Chapter 9 petition on September 30, 2017 as
12 case number 17-13797.

13 2. TRMC has reason to believe that Southern Inyo Healthcare District, is in
14 possession of information needed by TRMC which affects the rights of TRMC as well
15 as the administration of this bankruptcy estate.

16 3. TRMC believes that the information needed bears upon the acts,
17 conduct, or assets and liabilities of TRMC.

18 4. The examination will also relate to the operation of the TRMC's business
19 and the desirability of its continuance, the source of any money or property acquired or
20 to be acquired by TRMC for purposes of consummating a plan and the consideration
21 given or offered therefore, and any other matter relevant to the case or to the formation
22 of a plan.

23 5. Conducting such examination will assist TRMC in protecting its interests
24 in evaluating any plan that may be advanced and in furthering the administration of this
25 Chapter 9 proceeding.

26 6. By this Application TRMC requests that it be permitted to compel the
27 production of documentary evidence in the manner provided in FRBP 9016 followed by
28 an examination, if requested, of Southern Inyo Healthcare District.

7. By the requested Order Applicant will proceed to have issued a

1 Subpoena for Rule 2004 Examination with Production of Documents to be followed by
2 the examination of the witness, if documents are requested, no earlier than 10 days
3 after the date of issuance of the examination order or subpoena, whichever is later.

4 WHEREFORE, Applicant prays as follows:

5 A. The Court enter Order pursuant to FRBP 2004 authorizing the examination
6 of Southern Inyo Healthcare District;

7 B. The Court enter an Order pursuant to FRBP 2004 authorizing the issuance
8 of a Subpoena for Rule 2004 Examination with Production of Documents; and

9 C. For such other and further relief as is just and proper.

10 Dated: December 8, 2017

WALTER WILHELM LAW GROUP,
a Professional Corporation

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13 By: 

Riley C. Walter, Attorneys for
Tulare Local Healthcare District, dba
Tulare Regional Medical Center